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Preliminary* Care Cost Projections
August 27, 2006

RE: Winford "Dallas" Jones, Jr.

DOB: 09/23/67

SSN: 233-25-8726

DOI: 09/12/04

Prepared for Tim Kirtner, Esq.
Gilmer, Sadler, Ingram, Sutherland & Hutton, LLP

**This information is considered "preliminary" as I have yet to speak with the client's orthopedic surgeon, Thomas Shuler, MD, to obtain specific feedback regarding his costs and other professional fees that will be incurred with Mr. Jones undergoes repair of the fibrous union in his femoral fracture and revision/replacement of the femoral rod.*

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Summary of Injuries and Course of treatment:

Mr. Jones was involved in a motor vehicle collision on 09/12/04. He was taken to Carilion Roanoke Memorial Hospital (CRMH) via ambulance. Injuries listed on the emergency room records and in other medical records from CRMH included:

- Open fracture of the left femoral shaft
- Closed fracture of the left femoral neck
- Closed fractures of right radius and ulnar
- Closed fracture of right humerus
- Concussion
- Multiple lacerations and abrasions

While at CRMH, Mr. Jones underwent surgical repair of fractures with placement of hardware at the femur fracture, nailing of femoral neck fractures, and open reduction with external fixation of the right radial and ulnar fractures. Thomas Shuler, MD, orthopedic surgeon, was his attending physician throughout his stay and continues to follow Mr. Jones's orthopedic care.

During his hospitalization Mr. Jones developed a fever and was found to have Positive blood cultures for oxacillin resistant staph aureus. Appropriate antibiotic therapy was started. He also received seven units of packed red blood cells due to bleeding from his injuries and surgery.

Mr. Jones was an inpatient at CRMH from 09/14/04 until 09/27/04. He was discharged to the inpatient rehabilitation unit at HealthSouth Hospital in Princeton, WV. Carl Shelton, MD, physiatrist was the attending physician in the rehabilitation program and continues to follow Mr. Jones for his long-term rehabilitation needs.

Due to complaints of "flashbacks" and nightmares as well as symptoms of depression, Charles Shamro, MA, MS, CBT was consulted for psychological care and support on 08/22/05. He, along with Dr. Shelton, diagnosed Mr. Jones with post-traumatic stress disorder (PTSD) and depression. Mr. Shamro also continues to follow Mr. Jones, providing counseling and support.

Future care and associated costs

The following information is based on review of the client's medical records, personal interviews with Mr. Jones, conferences with Dr. Shelton and Mr. Shamro, as well as research of costs for surgical services at CRMH. Costs provided here are present day costs and do not reflect the impact of inflation or investment.

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Medical care:

1. Quarterly follow-up with Dr. Shelton for medication management, monitoring of pain issues, updating rehabilitation and therapy needs. As Mr. Jones requires the use of narcotic pain medication, he must obtain a new prescription each month and must be monitored closely for proper usage. He is presently only seeing the physician every 2 months and should be able to stretch these evaluations out to every 3 months barring any complications. However, when additional surgery is completed, the level of services can be expected to increase during the acute rehabilitation phase. Dr. Shelton projects that Mr. Jones will require this level of care for the remainder of his life.

*Cost: \$95.00 per visit/\$380.00 annually

2. Bi-monthly follow-up with C. Shamro. Counseling, biofeedback and other pain management techniques are provided as well as assistance with accepting changes in lifestyle and body image. Mr. Jones is also provided with support and problem-solving techniques essential to helping him adjust to his injuries, disability and to address the impact of these issues with his family members. Projections for services are bi-weekly for 6 months, then monthly for the following 12 months totaling 18 months. Additional services will be required upon completion of the 18 months; however the frequency and duration of these services cannot be projected at this time.

*Cost: \$120.00 per visit/\$2,880.00 for 18 months

3. Bi annual follow up with Thomas Shuler, MD. Dr. Shuler is following Mr. Jones recovery from his orthopedic injuries and the area of fibrous union in the left femur. His medical notes reflect that this area will eventually require repair and revision and that hardware failure will occur. However, he cannot project when this will occur.

*Cost: undetermined

4. Surgical repair of fibrous union femoral fracture and revision of hardware. As noted above, Dr. Shuler has noted in medical records that failure of the hardware is anticipated but he cannot project when it will occur

*Costs: Hospital - \$42,500.00
Surgeon, Anesthesia, Radiology and
Therapy services – undetermined

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5. Medications. Dr. Shelton presently has Mr. Jones on a regimen that includes Oxycontin, 20 mg, twice daily; Zoloft, 100 mg, daily**; Effexor, 37.5 mg, at night; and Ambien, 10 mg, at night.

Mr. Jones has been on this regimen for some time and, per Dr. Shelton, he is quite stable on it and can expect to continue on this for the remainder of his life. There may be some changes to the dosage of the medications and over time, newer medications may be developed that will work better, however, at this point it is reasonable to expect little change.

** Mr. Jones was using Zoloft prior to the motor vehicle collision for what he describes as anger and stress associated with driving the northeastern United States in his job. He was regularly in traffic in major metropolitan areas including Washington, DC, Baltimore and New York City. He denies an actual diagnosis of depression until the motor vehicle collision of 09/11/04.

*Costs:

Oxycontin -	\$101.77 - one month supply
Zoloft -	\$ 95.76 - one month supply
Effexor -	\$ 57.54 - one month supply
Ambien -	\$ 94.80 - one month supply
Total -	\$349.87 - one month supply
	\$4,198.44 annually

6. Laboratory testing. Due to the chronic use of multiple medications, it is reasonable to monitor Mr. Jones's renal and hepatic function annually, to make sure he is not having any long-term impact and to modify dosage if indicated.

*Costs:

Complete blood count -	\$ 37.00
Complete metabolic panel -	\$ 46.00
Total -	\$ 83.00

7. Therapy services. Mr. Jones went through extensive therapy both as an inpatient and outpatient. Dr. Shelton and Mr. Shamro have recommended and encouraged him to participate in an independent exercise program using the techniques that he learned through formal therapy. They also recommended he have access to a swimming pool for part of this independent exercise program. Mr. Jones has enrolled as a member at the Princeton Fitness Center in order to follow through with these recommendations. His physician feels this will be a lifelong need.

*Cost:

Membership fees - \$39.00/month = \$469.00/year

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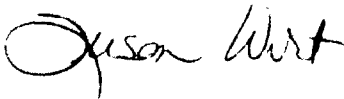
Annual costs based on current information**	\$ 5,130.44
Total annual costs (\$5,130.44 x 36.9 yrs**)	\$189,313.23
	+
One time costs***	<u>\$ 45,380.00</u>
Lifetime costs** (total annual costs + one time costs)	\$234,693.23

*Costs provided in this report are based on current day costs and do not include any consideration of inflation or investment.

**Code of Virginia Table § 8.01-419. Table of life expectancy projects 36.9 years for Mr. Jones based on his current age of 38.

*** Contact has not been completed with Thomas Shuler, MD, to obtain specific feedback regarding his professional fees and other professional fees that will be incurred with Mr. Jones undergoes repair of the fibrous union in his femoral fracture and revision/replacement of the femoral rod. Additional rehabilitation costs, psychological counseling, medical equipment, and other needs will likely be identified at that time.

Submitted by:



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